

May 20, 2020

VIA ECF FILING

Hon. Louis L. Stanton, U.S.D.J. United States Southern District Court

Re: Ethereum Ventures, LLC v. Chet Mining Co., LLC, et al.

Case No.: 1:19-cv-07949-LLS

Our File No.: 8461.009

Dear Judge Stanton,

Please be advised that this firm represents the plaintiff in the above referenced case.

I have made several attempts to contact the pro se defendants to no avail.

LEGAL ISSUES: Plaintiff alleges defendants committed fraud by failing to deliver promised and paid for computer equipment. It is also plaintiff's position that Chet Mining Co., LLC cannot proceed in this matter *pro* se as it is a business entity and its answer should be stricken sua sponte.

- 2. Plaintiff proposes the following scheduling order:
 - a. Plaintiff will depose Chet Stojanovich within 90 days (on or before August 20, 2020);
 - b. Production of relevant documents to take place within 60 days (on or before July 20, 2020);
 - c. The plaintiff does not anticipate any expert testimony;
 - d. Discovery to be completed within 120 days (on or before September 18, 2020);
 - e. Pre-Trial materials to be provided by plaintiff to defendants by September 18, 2020:
 - f. Pre-Trial Order submitted by October 9, 2020; and
 - g. Final pre-trial conference to be held on _______, 2020 at _______, p.m. (Plaintiff requests that the conference be held in the afternoon as counsel will be traveling from Albany, New York).
- 3. DISCOVERY LIMITATIONS: None, except that plaintiff request that depositions be completed by videoconference.
- 4. DISCOVERY DISPUTES: None but despite attempts, plaintiff's counsel has not been able to confer with Chet Stojanovich to reach an agreement.
- 5. EXPERTS: None.
- 6. TRIAL: Plaintiff anticipates the trial will day approximately 3 days.

28 SECOND STREET TROY, NY 12180 PHONE: (518) 274-5820 FAX: (518) 274-5875

7 AIRPORT PARK BOULEVARD LATHAM, NY 12110 PHONE: (518) 783-3843 FAX: (518) 783-8101

S11 BROADWAY SARATOGA SPRINGS, NY 12866 PHONE: (518) 584-8886

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- 7. This Scheduling Order may be altered or amended only on a showing of good cause not foreseeable at the time of the submission of the proposed Order or when justice so requires.
- 8. The defendants' contact info is as follows: Chet Stojanovich, 105 Duane Street, Apt. 20F, New York, New York 10007; e-mail: chet@chetmining.com; phone number (310) 824-3903.

John F. Harwick, Esq.

E. STEWART JONES HACKER MURPHY LLP

28 Second Street

Troy, New York 12180 Tel. No.: (518) 213-0113

E-Mail: jharwick@joneshacker.com

Chet Stojanovich, *Pro Se*Chet Mining Co., LLC
105 Duane Street, Apt. 20F
New York, New York 10007
Tel. No.: (310) 824-3903

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Chet Stojanovich (via e-mail & ECF Filing)
Client

cc: